

From: Dave Ballinger, CEO [dballinger@lowervalleycu.org]
Sent: Tuesday, February 03, 2009 1:20 PM
To: _Regulatory Comments
Subject: Comments on Advanced Notice of Propsed Rulemaking for Part 704

Dave Ballinger, CEO
301 S. 7th St.
Sunnyside, WA 98944-1502

February 3, 2009

Mary Rupp
Secretary to the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Dear Ms. Rupp:

Dear Ms. Rupp,

We appreciate the prompt and decisive action that NCUA took to preserve our Credit Union System. However, while we recognize the action was necessary, we feel that expensing this assessment out immediately may be more negative than necessary and have a definite effect on our Net Earnings and ROA.

We would like to recommend an alternative method of transferring premiums from Reserve and / or spreading out the assessment over two or more years. Both of these alternatives would have less of a negative effect on our ROA and Net Earnings.

We would appreciate your consideration in this very important matter.

Sincerely,

Dave Ballinger, CEO
509-837-5295